

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

GINA G. DOVE,

Plaintiff,

v.

**BLUECROSS BLUESHIELD OF
TENNESSEE, INC.**

Defendant.

Case No. 1:23-cv-00024-TAV-CHS

**District Judge Thomas A. Varlan
Magistrate Judge Christopher H. Steger**

JURY DEMANDED

**DEFENDANT’S ANSWER AND AFFIRMATIVE DEFENSES
TO PLAINTIFF’S COMPLAINT**

Defendant BlueCross BlueShield of Tennessee, Inc. (“BCBST”), with the agreement of Plaintiff Gina G. Dove (“Plaintiff”), pursuant to Local Rule 12.1, hereby jointly submit this Stipulation to extend BCBST’s deadline to respond to the Complaint.

Plaintiff filed her Complaint in state court on December 14, 2022, and served BCBST therewith on or about December 28, 2022. (*See* Notice of Removal, Docket Entry 1, at ¶¶ 1–2). BCBST removed the case to this Court on January 27, 2023. (*See id.*). Pursuant to Federal Rule of Civil Procedure 81(c)(2), BCBST has until February 3, 2022, to respond to the Complaint. Needing additional time to prepare and file its response, counsel for BCBST has contacted counsel for Plaintiff, requesting Plaintiff’s agreement to an extension of time to file the response, to which he appreciatingly agreed. Under the Local Rules of this Court, “If all counsel agree, parties shall be entitled to a 21 day initial extension of time in which to respond to the complaint[.]” LR 12.1. When the parties agree to the extension, “[n]o order is necessary for an initial extension of time.” *Id.*

Counsel for Plaintiff has agreed to stipulate to a ten (10) day extension of BCBST’s

deadline, entitling BCBST to additional time to file its response upon submission of this Stipulation. The extension will require that BCBST file its response on or before February 13, 2023.

DATED this 31st day of January, 2023.

/s/ Robert E. Boston

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 31st day of January, 2023, a true and correct copy of the foregoing document was electronically filed with the United States District Court for the Eastern District of Tennessee using the Court's Electronic Case Filing (ECF) system, which will serve all parties below as indicated on the electronic filing notice to receive service in this manner.

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/s/ Robert E. Boston
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